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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

J.P., by and through his Guardian
Ad Litem, SHANNON VILLANUEVA

Plaintiff,
v.

COUNTY OF ALAMEDA, DIANE DAVIS
MAAS, SUE MAY, TRIAD FAMILY
SERVICES, MARIA REFUGIO MOORE,
and DOES 1-30, inclusive.

Defendants.

Case No: 4:17-cv-05679-YGR

**STIPULATION AND ~~PROPOSED~~ ORDER
TO EXTEND DEADLINES FOR
PLAINTIFF J.P. AND DEFENDANT TRIAD
FAMILY SERVICES RELATING TO
TRIAD'S FIRST SUMMARY-JUDGMENT
MOTION**

Date: June 18, 2019
Time: 2:00 p.m.
Courtroom: 1, 4th Floor, 1301 Clay Street,
Oakland, CA
Judge: The Hon. Yvonne Gonzalez Rogers

Complaint Filed: October 2, 2017
Trial Date: TBD

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Defendant TRIAD FAMILY SERVICES (“TRIAD”) and plaintiff J.P., by and through their respective counsel, hereby stipulate as follows:

Whereas, TRIAD filed a motion for summary judgment on April 12, 2019 (Dkt.117) and this Court set a deadline for plaintiff J.P. to oppose this motion by April 23, 2019 and TRIAD to reply by April 30, 2019 with a hearing set on June 18, 2019;

Whereas the parties continue to meet and confer regarding the documents and deposition testimony which may be deemed confidential as defined by the Stipulated Protective Order filed on March 16, 2018 (Dkt. 51) or otherwise by privileged under Welfare & Institutions Code §827;

Whereas this process is a necessary step in determining whether J.P. would be required to file an Administrative Motion to Seal, under Local Rule 79-5;

Whereas, if an Administrative Motion to Seal, under Local Rule 79-5 is deemed to be necessary, J.P. will likely not have sufficient time to obtain a ruling on an Administrative Motion to Seal and still file its Opposition to Triad’s Motion for Summary Judgment by April 23, 2019;

IT IS THEREFORE STIPULATED, pursuant to Rules 7-12 of the Civil Local Rules of the United States District Court for the Northern District of California that:

- 1) The last day for plaintiff J.P. to file his opposition to TRIAD’s motion for summary judgment is extended from April 23, 2019 to May 17, 2019; and,
- 2) The last day for TRIAD to file his reply is extended from April 30, 2019 to May 24, 2019.

Dated: April 15, 2019

MATHENY SEARS LINKERT & JAIME LLP

By: /s/Ronald E. Enabnit
Ronald E. Enabnit, ESQ.
Attorneys for Defendant TRIAD FAMILY SERVICES

1 Dated: April 15, 2019

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3 By: /s/ Lizabeth N. de Vries
4 Lizabeth N. de Vries, ESQ.
Attorneys for Plaintiff J.P.

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6 PURSUANT TO STIPULATION, IT IS SO ORDERED.

7 DATED: April 18, 2019

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9 YVONNE GONZALEZ ROGERS
UNITED STATES DISTRICT JUDGE

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